

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LIZBETH O'KEEFE a/k/a LISBETH O'KEEFE,

Plaintiff,

- against -

JP MORGAN CHASE MANHATTAN BANK,

Defendant.  
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Civil No. 07CV9811

Justice Richard M. Berman

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed affidavit of Sheila E. Carson, Esq., sworn to April 11, 2008 with exhibits annexed thereto and all the prior pleadings and proceedings heretofore had herein, the undersigned, on behalf of Defendant JPMorgan Chase Bank, N.A. ("Chase"), by its undersigned counsel, the JPMorgan Chase Legal Department, hereby moves this Court for an order pursuant to Federal Rule of Civil Procedure 12(b)(1) and 12(b)(6) and the rules of the Southern District of New York dismissing Plaintiff's Amended Complaint and for such other and further relief as may be just and proper.

Dated: New York, New York  
April 11, 2008

JPMORGAN CHASE LEGAL DEPARTMENT

By: 

Sheila E. Carson, Esq.

*Attorneys for Defendant*

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TO:

**LIZBETH O'KEEFE**  
**a/k/a LISBETH O'KEEFE**  
**DEFENDANT PRO SE**  
**Post Office Box 286908**  
**New York, New York 10128**